

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
STEPHEN BECKMAN)	
)	
v.)	CIVIL ACTION NO.: 03-12567-NG
)	
BULL HN INFORMATION)	
SYSTEMS INC.)	
)	
_____)	

**DECLARATION OF KELLY S. BLACK-HOLMES IN SUPPORT OF THE
OPPOSITION OF DEFENDANT BULL HN INFORMATION SYSTEMS INC.
TO PLAINTIFF STEPHEN BECKMAN'S MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

I, Kelly S. Black-Holmes, hereby depose and state the following:

1. I am an associate at Wilmer Cutler Pickering Hale and Dorr LLP and am involved in the firm's representation of the defendant, Bull HN Information Systems Inc., in the above matter.
2. Attached as **Exhibit A** are true and correct copies of excerpts from the December 16, 2004 Deposition of Stephen Beckman.
3. Attached as **Exhibit B** is a true and correct facsimile copy of the March 24, 2005 Affidavit of Daniel Schroeder.
4. Attached as **Exhibit C** is a true and correct facsimile copy of the March 24, 2005 Affidavit of Mary Carrigan.
5. Attached as **Exhibit D** are true and correct copies of excerpts from the Objections and Responses of Defendant Bull HN Information Systems Inc. to Plaintiff Stephen Beckman's First Set of Interrogatories.

6. Attached as **Exhibit E** is a true and correct copy of Exhibit 4 to the December 16, 2004 Deposition of Stephen Beckman.

7. Attached as **Exhibit F** is a true and correct copy of Exhibit 5 to the December 16, 2004 Deposition of Stephen Beckman.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, THIS 25th DAY OF MARCH, 2005.

/s/ Kelly S. Black-Holmes
Kelly S. Black-Holmes